

Endless Medical Advantage (EMA) Whistleblowing Policy

What is Whistleblowing?

Definition from GOV.UK: “You’re a whistleblower if you’re a worker and you report certain types of wrongdoing. This will usually be something you’ve seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public. As a whistleblower you’re protected by law - you should not be treated unfairly or lose your job because you ‘blow the whistle’. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.”

This may include:

- A criminal offence including theft, fraud, bribery or corruption
- Failure to comply with any legal obligations or regulatory requirements
- A miscarriage of justice
- A danger to the health and safety of an individual
- Deliberate and hazardous environmental damage
- Money laundering
- Incidences of bullying, harassment or discrimination
- Unauthorised disclosure of confidential information
- Deliberate attempt to conceal any of the above

Purpose

Endless Medical Advantage (EMA) is committed to be an honest, transparent and responsible organisation. The aims of this policy are to encourage our Trustees and personnel to internally report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, confidentially and without being discriminated against. We aim to provide guidance on how to raise concerns without fear of reprisals, even if they turn out to be mistaken.

Scope

This policy applies to all employees, volunteers and trustees and those who work on behalf of EMA who sees wrongdoing can report it. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Complaints Procedure. If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer.



The Whistleblowing Officer responsible for handling all concerns as of 10th May 2021 is **Asma Patel**. You can contact her on: contact@endlessmedicaladvantage.org

Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. If you want to raise the matter in confidence, please make this clear when you make the report so that the appropriate arrangements can be made. Alternatively, you may make a report anonymously but please note that it is much harder (and sometimes impossible) to investigate suspicions without having direct access to the individual who raised the concern. We do not encourage staff to make disclosures anonymously. Whistleblowers who are concerned about possible repercussions if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can be taken to preserve confidentiality.

The Process

EMA encourages you to raise your concern with an appropriate member of staff. In the first instance, this would normally be your immediate line manager. You can make a report either orally or in writing. If the matter is more serious or you feel you cannot take it to your line manager, you should contact the Whistleblowing Officer. When reporting your concern, you will be required to give your name, your position, and details about the concern, including any evidence that you have to support the concern. This will enable the best possible investigation. It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur.

Upon receipt of your concern, an investigation will be conducted, and a meeting will be arranged as soon as possible. You may bring a colleague or representative to any meetings under this policy. You may be required to attend additional meetings in order to provide more information. Disclosures made to a legal advisor in the course of obtaining legal advice will be protected under the Public Interest Disclosure Act.

It is likely that further enquiries and/or investigation will be necessary. The concern may be investigated by the designated Whistleblowing Officer and/or the Trustees, through the disciplinary process or it may be referred to the police, other agencies such as Social Services, an external auditor or an independent investigator. It may be necessary for the individual to give evidence in criminal or disciplinary proceedings. Endless will provide feedback on the progress and outcome of any investigation wherever possible.

However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. While we cannot always guarantee the result you would like, we aim to deal with any concern in a correct and just manner. If we conclude that a whistleblower has made false allegations, EMA will take disciplinary action against them.



EMA will take appropriate action to protect the individual from any harassment, victimisation or bullying. Employees who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action or redundancy procedures.

If the suspicions are not confirmed by an investigation, the matter will be closed. Staff will not be treated or regarded any differently for raising the concern, and their confidentiality will be maintained.